

Commonwealth Edison 1400 Opus Place Downers Grove, Illinois 60515

April 21, 1994

Mr. William Russell, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attn: Document Control Desk

Subject:

Braidwood Unit 2 Request for EXIGENCY TECHNICAL SPECIFICATION AMENDMENT Facility Operation Licenses: NPF-77 Technical Specification Section 3/4.7.1 NRC Docket No. 50-457

- References: 1) G. Dick letter to D. Farrar transmitting Safety Evaluation for Main Steam Safety Valves dated April 18, 1994
 - 2) D. Saccomando letter to W. Russell transmitting request for Emergency Technical Specification amendment for Main Steam Safety Valves dated March 21, 1994
 - D. Saccomando letter to J. Zwolinski transmitting request for Notice of Enforcement Discretion regarding the Main Steam Safety Valves dated March 11, 1994

Dear Mr. Russell:

Pursuant to 10 CFR 50.91(a)(6), Commonwealth Edison Company (CECo) proposes to amend Appendix A, Technical Specifications of Facility Operating Licenses NPF-77, and requests that the Nuclear Regulatory Commission (NRC) grant an EXIGENCY amendment to Technical Specification Section 3/4.7.1. "Turbine Cycle Safety Valves."

The current Technical Specification Section 3.7.1.1 action "a" states that with one or more Main Steam Safety Valves (MSSV)s inoperable, operation in Modes 1, 2, and 3 may proceed provided, that within 4 hours, either the inoperable valve is restored to OPERABLE status or the Power Range Neutron Flux High Trip Setpoint is reduced per Table 3.7-1; otherwise be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

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W. Russell

The proposed amendment modifies the Technical Specifications to allow Braidwood Unit 2 to reach Mode 3 to reset the valves following the current forced outage. The proposed revision involves adding a note to the surveillance requirements stating that the provisions of Specification 4.0.4 are not applicable to Braidwood Unit 2 until the initial entry into MODE 2 following forced outage A2F27.

The attached safety analysis shows that this proposal will have no impact on safety.

This exigent change could not be avoided because CECo could not foresee that Braidwood Unit 2 MSSVs could not be reset by May 9, 1994, as stated in Table 3.7-2. The situation was not created by a failure to make a timely application of the Technical Specification Amendment because CECo could not anticipate the Unit 2 trip. Attachment E details the course of events which lead to the submittal of this exigency amendment.

This request for an exigency amendment request is necessary for Braidwood Unit 2 to resume power operation. Currently, CECo has 2 large units in forced outages requiring major repairs to their main power transformers, this includes Powerton 6 and Zion 1. In addition, CECo has 6 other units down for overhauls and also plans on taking additional units down for repairs prior to June 1st. In the event that Braidwood 2 is unable to return-to-service in a timely manner, the additional overbauls may be delayed into June. As a result of these delays, Commonwealth Edison may have inadequate owned reserves as we enter the peak usage period of the year. CECo requests that this amendment be approved by May 9, 1994, in order to allow Unit 2 to reach Mode 3 in accordance with current projected outage schedules.

In support of this request, the following information is attached:

Attachment	A:	Detailed Description Of The Proposed Changes
Attachment	B:	Revised Technical Specification Pages
Attachment	C:	Evaluation of Significant Hazards Considerations
Attachment	D:	Environmental Assessment
Attachment	E:	Justification of Exigent Request

This request for an Exigency Technical Specification Amendment has been reviewed and approved by onsite and off-site review in accordance with Braidwood procedures.

Pursuant to 10CFR50.91(b)(1) a copy of this request has been forwarded to the designated State of Illinois Official.

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W. Russell

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To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other CECo employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Please address any comments or questions regarding this matter to this office.

Respectfully,

Denise M. Saccomando

/ Denise M. Saccomando Nuclear Licensing Administrator

Attachments

cc: R. Assa, Braidwood Project Manager - NRR
S. Dupont, Senior Resident Inspector - Braidwood
J. B. Martin, Regional Administrator Region III
Office of Nuclear Facility Safety - ID.

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ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES TO APPENDIX A TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSE NPF-77

A. DESCRIPTION OF THE PROPOSED CHANGE

Commonwealth Edison Company (CECo) proposes a one time amendment to Specification 3.7.1.1 TURBINE CYCLE - SAFETY VALVES. The proposed revision involves adding a note to the surveillance requirements stating that the provisions of Specification 4.0.4 are not applicable to Braidwood Unit 2 until the initial entry into MODE 2 following forced outage A2F27.

B. DESCRIPTION AND BASES of the CURRENT REQUIREMENT

The Main Steam Safety Valves (MSSV) are currently required to be set within a lift setting tolerance of $\pm 1\%$. Technical Specification 3.7.1.1 Action "a" states that with one or more MSSVs inoperable, operation in MODES 1,2, and 3 may proceed provided, that within 4 hours, either the inoperable valve is restored to OPERABLE status or the Power Range Neutron Flux High Trip Setpoint is reduced per Table 3.7-1; otherwise be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The safety valves limit secondary pressure to within 110% of design pressure of 1200 psia during the most severe anticipated operating transient.

C. DESCRIPTION and BASES of the REQUESTED REVISION

At about 1730 hours on March 9, 1994, Braidwood System Engineering received a phone call from Furmanite Company indicating that an improper value for mean seat area was used in the Trevitest calculation for Main Steam Safety Valve setpoints. Calculations to determine the as-left condition of the MSSVs for each unit based on the revised mean seat area were completed at approximately 1500 hours on March 10, 1994. Results indicate that 17 valves each for Braidwood Units 1 and 2 fall outside the Technical Specification requirement of $\pm 1\%$. All valves for both units fall within $\pm 3\%$ of the nominal setpoints for the individual valves.

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On 3/21/94 Braidwood requested a one time amendment for Specification 3.7.1.1 to allow Unit 1 to reach MODE 3 to reset the Safety Valves following the current refueling outage, and to allow Unit 2 to operate until May 9, 1994 by which time the Safety Valves would have been reset. This schedule was based on unit operating schedules and Furmanite availability.

At 1539 hours on April 5, 1994, Braidwood Unit 2 reactor tripped as a result of a Main Power Transformer (MPT) fault. The MPT sustained enough damage to require replacement. During this reactor trip all systems functioned normally except for Control Bank B(CBB)control rod K-2 which failed to fully insert.

The Trevitesting procedure involves lifting the MSSV very slightly off it's closed seat with a resultant small steam release. Therefore as a conservative measure, to preclude the remote possibility of a positive reactivity transient with CBB rod K-2 not fully inserted, the MSSVs will not be reset until the problem with CBB rod K-2 has been resolved. The combination of the MPT replacement schedule and CBB rod K-2 repair plan will prevent Braidwood Unit 2 from resetting the MSSVs by the original date of May 9, 1994.

Accordingly, CECo is requesting the proposed Technical Specification amendment to allow Braidwood Unit 2 to reach Mode 3 to reset the valves following the current forced outage.

D. IMPACT OF THE PROPOSED CHANGE

The requested changes to Specification 3.7.1.1 due to the as-left setpoints of the MSSVs being greater than the allowed maximum of $\pm 1\%$ but within $\pm 3\%$ do not impact the safety margin. The MSSVs are analyzed for as-found setpoints of $\pm 3\%$, which Commonwealth Edison Company will apply for in an upcoming amendment request.

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The effects of increasing the as-found lift setpoint tolerance on the MSSV have been examined, and it has been determined that, with the exception of the Loss of Load/Turbine Trip, the current accident analyses as presented in the UFSAR remain valid. The loss of load/turbine trip event was analyzed in order to quantify the impact of the setpoint tolerance relaxation. All applicable acceptance criteria for this event remain satisfied and the conclusion presented in the UFSAR remains valid.

The conclusions presented in the Overpressure Protection Report remain valid.

No operating conditions or modes will be changed as a result of this evaluation. No new failure modes have been determined to exist as a result of this new analysis. The MSSVs will continue to relieve any unlikely system overpressure during all applicable operating modes. The increased as-found setpoint tolerance has no significant negative impact on any system, operating mode, or accident analysis.

E. SCHEDULE REQUIREMENTS

CECo requests that this amendment be approved by May 9, 1994 in order to allow Unit 2 to reach Mode 3 in accordance with current projected outage schedules.